

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

-----X

In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes

-----X

**CERTIFICATE OF COMPLIANCE BY
INTERNATIONAL UNION, UAW**

The International Union, UAW (the “UAW”), by and through counsel, hereby certifies its compliance with the Court’s May 13, 2014 Order Granting Motion to Compel Full Clawback of Debtor’s Document Production and Related Relief [Docket No. 4710].

Specifically, the UAW has:

1. Sent to the Debtor via nationally recognized overnight courier the Debtor’s May 6, 2014 document production (the “Production”);
2. Purged any electronic copies made of the Production or of any portion thereof;
3. Destroyed any physical copies made of the Production or of any portion thereof;

4. Destroyed any work-product reflecting the contents of any document in the Production.

Dated: May 14, 2014

Respectfully submitted,

By: /s/ *Peter D. DeChiara*

Cohen, Weiss and Simon LLP
Peter D. DeChiara
330 West 42nd Street
New York, NY 10036-6976
T: (212) 563-4100
F: (212) 695-5436
pdechiara@cwsny.com

- and -

Niraj R. Ganatra (P63150)
Michael Nicholson (P33421)
8000 East Jefferson Avenue
Detroit, MI 48214
T: (313) 926-5216
F: (313) 926-5240
nganatra@uaw.net
mnicholson@uaw.net

Attorneys for International Union, UAW

CERTIFICATE OF SERVICE

I certify that on this 14th day of May 2014, I caused the foregoing document to be served on counsel for Debtor City of Detroit and on all other parties of record through the Court's CM/ECF system.

/s/ *Peter D. DeChiara*

Peter D. DeChiara